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125 BROAD STREET, 39TH FLOOR NEW YORK, NEW YORK 10004-2400

www.sedgwicklaw.com 212.422.0202 phone 212.422.0925 fax

**Sedgwick**<sub>LLP</sub>

*Daniel Meier*  
(212) 898-4016  
*daniel.meier@sedgwicklaw.com*

January 30, 2012

*Via ECF*

Honorable Stanley R. Chesler, U.S.D.J.  
United States District Court  
District of New Jersey  
Martin Luther King, Jr. Federal Building &  
U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07101

Re: *James Wright v. Hartford Financial Services Group, et al.*

Civil Action No.: 2:11-CV-00602-SRC-MAS

SDMA File No.: 02489-000119

Dear Judge Chesler:

This office represents the defendant, Hartford Life and Accident Insurance Company (“Hartford”), in the above-referenced matter. We are writing to respectfully request that the Court grant all parties a two-week extension of time to file their reply papers in further support of their respective motions for summary judgment from February 3, 2012 to February 17, 2012. In addition, Hartford also requests that the Court extend its time to file its reply papers in further support of its motion to strike the plaintiff’s attorney’s affidavit and corresponding exhibits submitted in support of his motion for summary judgment from February 6, 2012 to February 21, 2012.

On Friday, January 27, 2012, plaintiff served and filed several submissions in support of both his opposition to Hartford’s motion for summary judgment and his opposition to Hartford motion to strike. Specifically, the plaintiff filed a 25 page memorandum of law in opposition to Hartford’s motion for summary judgment; an Affidavit in opposition to Hartford’s motion to strike, including a request for leave of the Court to file a proposed amended Rule 56.1 Statement of Material Facts; and a memorandum of law in opposition to Hartford’s motion to strike. These submissions include new arguments that the plaintiff did not submit during Hartford’s administrative review process or in support of his own motion for summary judgment and also, include a request for new relief (i.e. for leave to file an amended Rule 56.1 Statement of Material Facts). Therefore, Hartford requires an extension of time to sufficiently respond to the plaintiff’s several submissions. As referenced above, the plaintiff joins in Hartford’s request for a two-week extension of time to file his reply papers in further support of his motion for summary judgment and also, consents to Hartford’s request regarding its motion to strike.

Thank you for your consideration of this matter.

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Respectfully submitted,



Daniel Meier

Sedgwick LLP

cc:

*Via Regular Mail and ECF*

Kevin T. Kutyla, Esq.

2/1/2012  
AO ORDERED:  
SARAH R. CUTTER AND TIGER, PLLC